

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

CONDITIONAL MAJOR DRAFT PERMIT NO. F-06-053

Louisville Bedding Company

Munfordville, Kentucky

September 14, 2006

ELAHE HOUSHMAND

PLANT I.D. #21-099-00008

A.I. NUMBER: 38414

ACTIVITY NUMBER: APE20030001

DESCRIPTION:

Louisville Bedding Company operates low-melt process lines for the manufacture of mattress pads. A polyester fiber is mixed with a low-melting copolymer, rolled into sheets, heated to 320° F, cut to size, and collected on take-up spools. The polyester to copolymer blend is approximately 82-85% polyester and the remainder copolymer.

COMMENTS:

Louisville Bedding has submitted an application for a permit renewal. There has been no change in process and materials from the current permit, F-98-03. The only change is removal of the gluing stations that is listed on the current permit as an insignificant activity.

Louisville Bedding's potential VOC emission is over the 100 tons/yr threshold. However, the facility has requested that enforceable limit be placed on their actual VOC emissions so that the source be conditional major for VOC.

TYPE OF CONTROL AND EFFICIENCY:

There is no control for VOCs so it is assumed that all VOCs are emitted to the atmosphere.

EMISSION FACTORS AND THEIR SOURCE:

MSDS, Engineering Calculations and AP-42

Applicable Regulations:

None

EMISSION AND OPERATING CAPS DESCRIPTION:

Source-wide VOC emissions shall not exceed ninety (90) tons, during any consecutive twelve (12) month period.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.